

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

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In re:	:	
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THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO <i>et</i>	:	(Jointly Administered)
<i>al.</i> ,	:	
	:	
Debtors. <sup>1</sup>	X	
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**MOTION TO INFORM APPEARANCE OF CANTOR-KATZ COLLATERAL  
MONITOR LLC AT DISCLOSURE STATEMENT HEARING**

**TO THE HONORABLE COURT:**

**COME NOW** Cantor-Katz Collateral Monitor LLC, a Delaware limited liability company which serves as the collateral monitor for Wilmington Trust, N.A. in connection with the new bonds issued by the GDB Debt Recovery Authority (the “DRA”) pursuant to the *Government Development Bank for Puerto Rico Debt Restructuring Act*, Act No. 109-2017, as amended by Act No. 147-2018 and the approved Qualifying Modification for the Government Development Bank

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<sup>1</sup> The Debtors in these title III cases, along with each Debtor’s respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

for Puerto Rico<sup>2</sup> under Title VI of the *Puerto Rico Oversight, Management and Economic Stability Act* (the “Collateral Monitor”), by and through the undersigned legal counsel, hereby submits this motion to inform (the “Informative Motion”) pursuant to this Honorable Court’s *Order Regarding Procedures for Disclosure Statement Hearing* [Dkt. No. 17210] (the “Procedures Order”),<sup>3</sup> and respectfully states as follows:

1. Douglas S. Mintz and Douglas I. Koff of Schulte Roth & Zabel LLP will appear on behalf of Collateral Monitor at the Disclosure Statement Hearing (the “Hearing”), which will be conducted telephonically via CourtSolutions.

2. Mr. Mintz may present oral argument related to the following:

- a. *Disclosure Statement for the Fourth Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.* [Dkt. No. 17192];
- b. *Fourth Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al. (Corrected Version)* [Dkt. No. 17194];
- c. *Amended Joint Motion of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority for an Order (I) Approving Disclosure Statement, (II) Fixing Voting Record Date, (III) Approving Confirmation Hearing Notice and Confirmation Schedule, (IV) Approving Solicitation Packages and Distribution Procedures, (V) Approving Forms of Ballots, and Voting and Election Procedures, (VI) Approving Notice of Non-Voting Status, (VII) Fixing Voting, Election, and Confirmation Deadlines, and (VIII) Approving Vote Tabulation Procedures* [Dkt. No. 16756]
- d. *Objection of the DRA Parties to the Amended Joint Motion of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority for an Order (I) Approving Disclosure Statement, (II) Fixing Voting Record Date, (III) Approving Confirmation Hearing Notice and Confirmation Schedule, (IV) Approving Solicitation Packages and Distribution Procedures, (V) Approving Forms of Ballots, and Voting and Election Procedures, (VI) Approving Notice of Non-Voting*

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<sup>2</sup> See Dkt. No. 270 of Civil Case No. 18-01561 (LTS).

<sup>3</sup> Capitalized terms used herein and otherwise not defined shall have the meaning ascribed to such term in the Procedures Order.

- Status, (VII) Fixing Voting, Election, and Confirmation Deadlines, and (VIII) Approving Vote Tabulation Procedures [Dkt. No. 17006];*
- e. *Omnibus Reply of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority to Objections to Amended Joint Motion for Order (I) Approving Disclosure Statement, (II) Fixing Voting Record Date, (III) Approving Confirmation Hearing Notice and Confirmation Schedule, (IV) Approving Solicitation Packages and Distribution Procedures, (v) Approving Forms of Ballots, and Voting and Election Procedures, (VI) Approving Notice of Non-Voting Status, (VII) Fixing Voting, Election, and Confirmation Deadlines, and (VIII) Approving Vote Tabulation Procedures [Dkt. No. 17187];*
  - f. *Statement in Opposition of Assured Guaranty Corp., Assured Guaranty Municipal Corp., and National Public Finance Guarantee Corporation to the Objection of the DRA Parties to the Amended Joint Motion of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority for an Order (I) Approving Disclosure Statement, (II) Fixing Voting Record Date, (III) Approving Confirmation Hearing Notice and Confirmation Schedule, (IV) Approving Solicitation Packages and Distribution Procedures, (V) Approving Forms of Ballots, and Voting and Election Procedures, (VI) Approving Notice of Non-Voting Status, (VII) Fixing Voting, Election, and Confirmation Deadlines, and (VIII) Approving Vote Tabulation Procedures (ECF no. 17006) [Dkt. No. 17188]; and*
  - g. Any other responses or filings related to the foregoing.
3. Mr. Koff may present oral argument related to the following pleadings:
- a. *Motion of Debtors for an Order Establishing, Among Other Things, Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith [Dkt. No. 16757];*
  - b. *Objection of the DRA Parties to the Motion of Debtors for an Order Establishing, Among Other Things, Procedures and Deadlines Concerning Objections to Confirmation and Discovery In Connection Therewith [Dkt. No. 16997];*
  - c. *Debtors' Omnibus Reply in Support of their Motion for an Order Establishing, Among Other Things, Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith [Dkt. No. 17189]; and*
  - d. Any other responses or filings related to the foregoing.
4. In addition, the Collateral Monitor reserves the right to be heard and present oral

argument to address any matter identified in the agenda to be filed by the Oversight Board in connection with the Hearing, or raised by any party at the Hearing related to the Title III cases or any adversary proceeding which may affect the interests of the DRA. The Collateral Monitor reserves the right to amend this Informative Motion as needed.

5. Carmen D. Conde Torres, Esq. and Luisa S. Valle Castro, Esq. of C. Conde & Assoc., as local counsel for the Collateral Monitor, will attend the Omnibus Hearing through the listen-in access lines provided by the Court.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 8th day of July 2021.

**WE HEREBY CERTIFY** that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the parties appearing in said system including the US Trustee and to all those parties registered to receive notice within the electronic notification service.

**C. CONDE & ASSOC. LAW OFFICES**

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*-and-*

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***Attorneys for Cantor-Katz Collateral Monitor  
LLC, as Collateral Monitor for GDB Debt  
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